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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**STIPULATION AND [PROPOSED]
ORDER RE: RESPONSE TO
PLAINTIFFS' FOURTH AMENDED
COMPLAINT**

The Honorable Yvonne Gonzalez Rogers

1 This stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively
2 referred to as the “Parties.”

3 WHEREAS, on April 8, 2022, Google filed its Answer to Plaintiffs’ Third Amended
4 Complaint, Dkt. 531 (“Google’s Prior Answer”);

5 WHEREAS, on February 28, 2023, the Parties stipulated that Plaintiffs may file a Fourth
6 Amended Complaint;

7 WHEREAS, on March 2, 2023, the Court entered the Case Management and Pretrial Order,
8 Dkt. 885, granting Plaintiffs leave to file a Fourth Amended Complaint. Dkt. 885 at 3;

9 WHEREAS, the Case Management and Pretrial Order directed the Parties to file a stipulation
10 that Google’s Prior Answer shall apply to the Fourth Amended Complaint and that no further
11 response to the Fourth Amended Complaint is required. Dkt. 885 at 3;

12 WHEREAS, on March 2, 2023, Plaintiffs filed a Fourth Amended Complaint, Dkt. 886;

13 WHEREAS, pursuant to the Case Management and Pretrial Order, the Parties file this
14 Stipulation and [Proposed] Order Regarding the Response to Plaintiffs’ Fourth Amended
15 Complaint;

16 WHEREAS, Google reserves its rights to challenge the availability of the remedies Plaintiffs
17 seek in the Fourth Amended Complaint;

18 NOW THEREFORE, the Parties stipulate that Google’s Prior Answer shall apply to the
19 Fourth Amended Complaint and that no further response to the Fourth Amended Complaint is
20 required.

21
22 DATED: March 16, 2023

QUINN EMANUEL URQUHART &
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23
24 By /s/ Andrew H. Schapiro

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1 DATED: March 16, 2023

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ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding the Response to Plaintiffs' Fourth Amended Complaint. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: March 16, 2023

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Defendants

[PROPOSED] ORDER

Pursuant to stipulation of the parties, the Court hereby **ORDERS:** Google's Answer to Plaintiffs' Third Amended Complaint, Dkt. 531, shall apply to Plaintiffs' Fourth Amended Complaint and no further response to the Fourth Amended Complaint is required.

IT IS SO ORDERED.

DATED: _____, 2023

Hon. Yvonne Gonzalez Rogers
United States District Judge